

1 Honorable Christopher M. Alston
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6 IN THE UNITED STATES BANKRUPTCY COURT FOR THE
7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE

8 In re:) Chapter 7
9 JACK CARLTON CRAMER JR.,) Bankruptcy No. 18-13383
10 Debtor(s).) EX PARTE MOTION FOR AN ORDER
11 _____) APPROVING EMPLOYMENT OF
12) ACCOUNTANT

13 COMES NOW the trustee, Edmund J. Wood, through counsel, The Livesey Law Firm, and
14 Rory C. Livesey, and respectfully represents as follows:

15 1. The trustee is duly appointed in the above referenced matter and is acting as such.

16 2. The trustee wishes to employ, pursuant to 11 U.S.C. § 327, the services of Richard
17 N. Ginnis, CPA, to prepare tax returns and provide general accounting services for the estate. Your
18 applicant has chosen the named accountants for the reason that they are an experienced certified
19 public accountant firm and competent to perform the services requested.

20 3. The accountants have no conflict of interest with the estate under the definitions of
21 11 U.S.C.

22 4. The trustee is aware of no connections between the accountant and the debtor,
23 creditors, any party in interest, their respective attorneys and accountants, the United States Trustee,
24 and any person employed in the office of the United States Trustee other than as set forth in the
25 accountant's declaration.

26 5. The terms of employment are that the accounting firm shall provide the necessary
27 services at their standard hourly rate and will be paid after an application has been filed herein and
28 an order allowing their compensation has been entered. No retainer has been paid or promised.

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THE LIVESEY LAW FIRM
600 Stewart Street, Suite 1908
Seattle, WA 98101
(206) 441-0826

1 No notice to creditors of this motion is necessary pursuant to 11 U.S.C. § 102(1) and
2 Bankruptcy Rule 2002.

3 WHEREFORE, the trustee prays that the court approve the employment of the accounting
4 firm as stated above to perform the professional services stated.

5 RESPECTFULLY SUBMITTED this 2nd day of August, 2019.

6 THE LIVESEY LAW FIRM

7 */S/ Rory C. Livesey*

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9 Rory C. Livesey, WSBA #17601
Attorney for Trustee

10 The undersigned declares under the penalty of perjury that she provided the U. S. Trustee
11 Office with a copy of this motion, declaration of no adverse interest and proposed order, and at least
12 seven days have passed since the application was served upon and received by the U.S. Trustee and
no objection has been made, or the undersigned has been contacted by the U.S. Trustee's Office and
informed of its approval.

13 DATED this 6th day of August, 2019.

14 */S/ Patricia K. Johnson*

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16 Patricia K. Johnson

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